

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Ameren Transmission Company of Illinois	}	
	}	
Petition for a Certificate of Public Convenience	}	
and Necessity, pursuant to Section 8-406.1 of	}	
the Illinois Public Utilities Act, and an Order	}	
pursuant to Section 8-503 of the Public Utilities	}	Case No.: 12-0598
Act, to Construct, Operate and Maintain a New	}	
High Voltage Electric Service Line and Related	}	
Facilities in the Counties of Adams, Brown, Cass,	}	
Champaign, Christian, Clark, Coles, Edgar,	}	
Fulton, Macon, Montgomery, Morgan, Moultrie,	}	
Pike, Sangamon, Schuyler, Scott, and Shelby,	}	
Illinois.	}	

REPLY BRIEF OF THE COLFAX-SCOTT LAND PRESERVATION GROUP

NOW COMES the Colfax-Scott Land Preservation Group (hereinafter referred to as “CSLPG”), by and through its attorneys, Edward D. McNamara, Jr. and Joseph H. O’Brien of McNamara & Evans, and for its Reply Brief, states as follows:

REITERATION OF CSLPG POSITION

CSLPG filed its Initial Brief herein on June 3, 2013, in which it summarized its case in favor of the ATXI proposed Primary Route for selection from the routing options now presented to the Commission for consideration for the segment of the Project from Sidney to Rising. After a review of the Initial Briefs filed by Commission Staff, ATXI, the Ragheb Family, and The City of Champaign and the Village of Savoy, CSLPG wishes to reiterate its position, stated in its Initial Brief as follows: “CSLPG would submit, for the foregoing reasons and based on an overwhelming preponderance of the evidence presented in this matter as it relates to the requirements set forth in 220 ILCS 5/8-406.1(f), that the clear least cost choice of routing options presented for the segment of the Project from Sidney to Rising would be the ATXI proposed Primary Route.”

REPLY TO INITIAL BRIEF OF THE STAFF OF THE ILLINOIS COMMERCE COMMISSION

The Staff of the Illinois Commerce Commission filed its Initial Brief herein on June 3, 2013 (hereinafter referred to as “Staff Brief”). The recommendation contained in the Staff Brief directly coincides with that of CSLPG. The Commission Staff position, as it relates to the segment of the route from Sidney to Rising, is summarized as follows, to wit: “ATXI’s primary route is far shorter and would require fewer dead-end structures, and thus is preferable. In addition, AIC’s legacy utility already acquired land rights for much of this transmission line route, so that for some time landowners along ATXI’s primary route have been aware of the possibility of a transmission line.” (Staff Brief, p. 37)

Commission Staff participates in cases such as this to provide objective, unbiased, and expert guidance to the Administrative Law Judges as they navigate the technicalities and vagaries involved in a case as massive as this. After careful analysis by Commission experts, a recommendation was submitted which directly parallels that of CSLPG. The only truly objective voice among the parties to this matter, one with no vested interest nor conflict of interest, rendered in its expert opinion, a recommendation which completely substantiates the position advocated by CSLPG.

REPLY TO INITIAL BRIEF OF ATXI

ATXI filed its Initial Brief herein on June 3, 2013 (hereinafter referred to as “ATXI Brief”). ATXI advocates selection of its proposed Primary Route for the segment from Sidney to Rising, also directly in line with the recommendation of Commission Staff and CSLPG.

OTHER INTERVENING INTERESTS

In addition to CSLPG, only the Ragheb Family and The City of Champaign and The Village of Savoy actively participated as intervenors with interest to the portion of the route from Sidney to

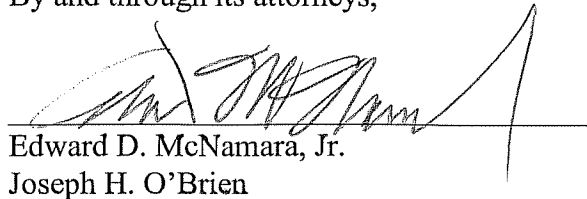
Rising. The Ragheb Family also agrees that if constructed, the proposed Primary Route is the preferable of the routing options now before the Commission for consideration. (Ragheb Family Brief, p. 5) The City of Champaign and The Village of Savoy also voice no opposition for the proposed Primary Route, except for a segment which affects property which is the interest of the Village of Savoy. (Champaign and Savoy Brief, p. 1)

Although unanimity will never exist in a matter as massive and far reaching as this, for the portion of the route from Sidney to Rising, among the parties to this matter, virtual unanimous preference for the proposed Primary Route does indeed exist.

CONCLUSION

CSLPG would submit, for the foregoing reasons and based on an overwhelming preponderance of the evidence presented in this matter as it relates to the requirements set forth in 220 ILCS 5/8-406.1(f), that the clear least cost choice of routing options presented for the segment of the Project from Sidney to Rising would be the ATXI proposed Primary Route. The proposed Primary Route not only poses the least cost choice but also the choice with the least impact on potentially affected landowners. CSLPG prays that if approval is granted for the Project, the Commission enter an Order herein selecting the ATXI proposed Primary Route for the segment of the route from Meredosia to Ipava.

Respectfully Submitted,
Colfax-Scott Land Preservation Group,
By and through its attorneys,



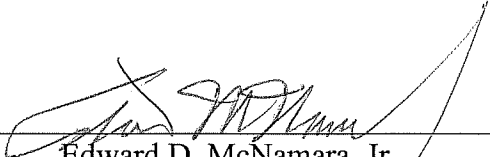
Edward D. McNamara, Jr.
Joseph H. O'Brien

VERIFICATION

STATE OF ILLINOIS }
 }SS
COUNTY OF SANGAMON }

Edward D. McNamara, Jr., being first duly sworn, deposes and says that he is authorized to execute this Reply Brief; that he has read the above and foregoing document, has knowledge of the facts stated therein; and herewith states that the matters set forth therein are true in substance and in fact.

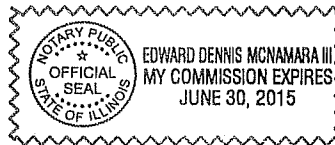
Subscribed and Sworn to before me
this 10th day of June, 2013.



Edward D. McNamara, Jr.

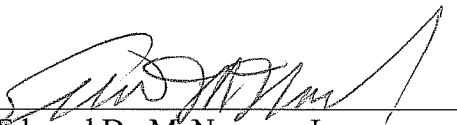


Notary Public



CERTIFICATE OF SERVICE

Edward D. McNamara, Jr., an attorney, hereby certifies that he served copies of the foregoing Reply Brief on the individuals shown on the attached Service List, via electronic mail, on June 10, 2013.



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